

Normative Letter 21-1222

December 22, 2021

A: ORGANIZACIONES DE MANEJO COORDINADO DE SALUD (MCOs) CONTRATADAS PARA EL PLAN VITAL

RE: Plan Vital Health Care Improvement Program (Year 4)

The Puerto Rico Health Insurance Administration's (ASES, its acronym in Spanish) has revised the approach to the Plan Vital Health Care Improvement Program (HCIP) for the final year of the current model. This change is being made based on an internal review of the program and feedback provided by the MCOs during the duration of the program. This change applies to Year 4 of the HCIP (10/1/21 through 9/30/22) and is effective immediately.

Per Plan Vital contract Attachment 19 (Health Care Improvement Manual), ASES will evaluate MCO performance in Year 4, taking a similar approach to earlier years of the program. ASES will continue to maintain a retention fund using withheld amounts of the MCO per member per month (PMPM) payment each month as described in Section 22.4 of the Contract. The retained PMPM amount will be associated with the HCIP initiatives outlined below:

- 1. High Cost Conditions Initiative
- 2. Chronic Conditions Initiative
- 3. Healthy People Initiative
- 4. Emergency Room High Utilizers Initiative

ASES will disburse the retention fund to the Contractor according to each MCOs compliance with each of the categories of performance indicators for each of the four (4) HCIP Initiatives specified in the HCIP manual and will audit the results of the data according to the timeframes stated in Section 22.4.2.2 of the Contract for the performance indicators.

To support this change for Year 4 of HCIP, the HCIP manual (Version Date: December 17, 2021) was updated to reflect this update.

ASES will evaluate PMPM disbursement from the retention fund based on timely and accurate report submissions from the Contractor.

Year 4 Submission Schedule:

For Year 4 of the HCIP, the Contractor must submit Report 22 based on the following schedule. There have been no changes to this schedule per this normative letter.

Period	Claims Data: Incurred Service Time Period - Start	Claims Data: Incurred Service Time Period - End	Submission Due Date to ASES
Year 3			
P4	10/1/2020	9/30/2021	1/30/2022
Year 4			
P1	1/1/2021	12/31/2021	4/30/2022
P2	4/1/2021	3/31/2022	7/30/2022
P3	7/1/2021	6/30/2022	10/30/2022
P4	10/1/2021	9/30/2022	1/30/2023

Year 4 Evaluation Criteria

Similar to the approach implemented in Years 2 and 3 of the model, ASES will disburse the retention fund to the Contractor according to compliance with each of the categories of performance indicators for each of the four (4) HCIP Initiatives specified in the HCIP manual **based on a timely and accurate report submission for each initiative**. A Contractor's retention fund withhold will not be tied to the Contractor's performance on a specific measure to an established benchmark or past performance.

Period	Claims Data: Incurred Service Time Period	Evaluation criteria
Year 3	Contractor GHP Benchmark Data Analysis — From January 1, 2019 to December 31, 2019: To be provided by ASES.	
PY4	10/1/20209/30/2021	Report submission
Year 4	Contractor GHP Benchmark Data Analysis — From January 1, 2020 to December 31, 2020: To be provided by ASES.	
PY1	1/1/2021-12/31/2021	Report submission
PY2	4/1/2021-3/31/2022	Report submission
PY3	7/1/2021-6/30/2022	Report submission
PY4	10/1/2021-9/30/2022	Report submission

New Model Effective 10/1/22

ASES are developing a more streamlined and transparent HCIP for the upcoming new model. More information will be shared in the Spring of 2022.

Cordialmente,

Jorge E. Galva, JD, MHA Director Ejecutivo